

MEMO ENDORSED

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September 1, 2021

Via ECF

Hon. Valerie E. Caproni
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *Flores v. Lexington Fresh Farm Inc., et al*
Civil Action No. 21-cv-00912

Your Honor:

We are attorneys for the defendants Lexington Fresh Farm Inc d/b/a Smiley's Deli ("Lexington"), Amir Kareem s/h/a Amir Doe ("Amir"), Nayeem Ghesani s/h/a Nasir Ghesani a/k/a Nayeem Ghesani ("Nayeem"), and Nasir Ghesani s/h/a Atul N. Kasmira ("Nasir") (collectively, "Defendants")¹ in the above-captioned matter, and write jointly with counsel for plaintiff Alejandro Flores ("Plaintiff") to respectfully request brief adjournments of (i) the September 4, 2021 deadline to file a joint motion for judicial approval of the proposed settlement between the parties; and (ii) the September 10, 2021 conference to be held if no letter is filed by September 4, 2021. This is the parties' first request for such adjournments.

As the Court is aware, the parties have reached a settlement in this matter. The parties are in the process of reducing the terms of their proposed settlement to writing and will begin gathering signatures soon. The parties respectfully request that (i) the deadline to file a joint motion for judicial approval of the proposed settlement agreement be adjourned to September 20, 2021, and (ii) that the September 10, 2021 conference be adjourned to September 27, 2021.

We thank the Court for consideration in this matter.

Cc: Counsel for Plaintiff (via ECF)

Respectfully submitted,
/s/ Nicola Ciliotta
Nicola Ciliotta

¹ The remaining individual defendants have not appeared in this action.

The deadline to file the joint motion for judicial approval of the proposed settlement is adjourned to **Friday, September 17, 2021**. If the joint motion is not filed by September 17, 2021, a conference shall be held on **September 24, 2021, at 10:00 A.M.** in Courtroom 443 of the Thurgood Marshall U.S. Courthouse, 40 Foley Square, New York, New York 10007. The conference currently scheduled for Friday, September 10, 2021 at 10:00 A.M. is canceled. For additional details about the joint motion, the parties should consult the Court's order at docket entry 35.

SO ORDERED.



Date: September 1, 2021

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE